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MICHAEL ANTHONY SAAVEDRA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MICHAEL ANTHONY SAAVEDRA,
Plaintiff,
vs.
A. HEDGPETH, et al.,
Defendants..

Case No. C-09-0178 CRB (PR)

**PARTIES' STIPULATION AND
[PROPOSED] ORDER TO CONTINUE
CASE MANAGEMENT CONFERENCE**

Currently Scheduled CMC:

Date: December 7, 2012
Time: 8:30 a.m.
Place: Courtroom 8
19th Floor

Complaint Filed: January 14, 2009

Honorable Charles R. Breyer

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

Plaintiff Michael Anthony Saavedra ("Plaintiff") and Defendants Anthony Hedgpeth, et al. ("Defendants") (collectively, "the parties") hereby submit this Stipulation and [Proposed] Order to Continue the Case Management Conference currently scheduled for December 7, 2012.

STIPULATION

WHEREAS, on October 17, 2012, the Parties conducted a Settlement Conference before Magistrate Judge Vadas, at which the Parties reached a tentative settlement of this lawsuit;

WHEREAS, counsel for the Parties have worked since the Settlement Conference to reach final terms for the settlement agreement, but have not yet agreed on final terms;

WHEREAS, Plaintiff's counsel's offices are in San Francisco, California, and Plaintiff is incarcerated in the Segregated Housing Unit at Corcoran State Prison, a round trip distance of approximately 500-miles;

WHEREAS, Plaintiff's counsel's communication with Plaintiff for the purpose of discussing and approving settlement terms has been limited to US mail, which is delayed by the prison security screening system;

WHEREAS, the Parties have requested Magistrate Judge Nandor Vadas continue the currently scheduled December 4, 2012 telephonic status conference be continued in the interests of judicial economy due to the near final resolution of this matter;

WHEREAS, the Parties agree that the December 7, 2012 Case Management Conference should be continued in the interests of judicial economy due to the near final resolution of this matter;

IT IS HEREBY STIPULATED, by and between the parties that the December 7, 2012 Case Management Conference should be continued due to the pending settlement discussions until January 18, 2013 in order to allow sufficient time for the parties to resolve this matter.

DATED: November 29, 2012

BY: /s/ Alicia Adornato

Alicia A. Adornato

Reed Smith LLP

*Pro Bono Attorneys for Plaintiff Michael
Anthony Saavedra*

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DATED: November 29, 2012

BY: /s/Michael Quinn

Michael J. Quinn

Deputy Attorney General

(as authorized on November 29, 2012)

*Attorneys for Defendants Valdez, Martinez,
Hughes, and Hedgpeth*

ORDER

Because of the continuing settlement discussions, the December 7, 2012 Case Management Conference is continued to January 18, 2013.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

December 3,
Dated: ~~November 1, 2012~~, 2012

